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RECEIVED
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GENERAL
COUNSEL

VIA FACSIMILE

Mr. Brad Deutsch, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

*Supplement
to*

AOR 2004-31

Re: Additional Information - AOR 2004-31, Blue Draft

Dear Mr. Deutsch:

This is to follow-up on our telephone conversation today in which I advised you of an intervening fact that has just come to my attention regarding the above-referenced Advisory Opinion Request 2004-31 ("AOR"). The AOR was filed by Russ Darrow Group, Inc. on July 21, 2004, in which we made the following representation:

"Conversely, Russ Darrow III, has not appeared in any Candidate campaign ads or public appearances as a spokesman for Candidate or his campaign". AOR 2004-31, page 3.

That statement was true and correct as of the date of the filing of the AOR. It has come to my attention that since the AOR was filed by the Company, the Russ Darrow for Senate campaign produced and aired in August a 30-second television commercial which contains a 1.5 second scene in which Russ Darrow III appears. He is not identified by name and has no speaking role in the advertisement.

As a result of this advertisement, that portion of the sentence in the AOR which states Russ Darrow III has not appeared in any Candidate campaign ad is no longer true. However, the second part of the sentence in which we state that Russ Darrow III has not made any public appearances as a spokesman for the Candidate or the campaign is still accurate.

It is our view that the facts disclosed herein do not materially change the representations made in the AOR but I wanted to be certain to call this instance to your attention in the interests of total accuracy and veracity.

The final sentence of that same paragraph of the AOR is still completely accurate and operative:

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"Candidate and Requester are two distinct and separate legal entities operating and advertising separately and without consultation or coordination with one another." AOR 2004-31, page 3.

Please contact me if you have further questions regarding this matter. Thank you.

Sincerely,



Cleta Mitchell, Esq.
Counsel to Russ Darrow Group, Inc.

cc: Mr. Russ Darrow III